

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WILMINGTON DIVISION

IN RE:

TSR, LLC

DEBTOR

CASE NO: 23-01577-5-DMW

CHAPTER 7

**APPLICATION FOR EMPLOYMENT OF**  
**MATTHEW LADENHEIM AND TREGO, HINES AND LADENHEIM, PLLC**  
**AS SPECIAL COUNSEL**

Pursuant to the provisions of §§ 327(a) and 328(a) of the Bankruptcy Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure, the Chapter 7 Trustee, John C. Bircher III (“Trustee”), makes an application for an Order approving the employment of MATTHEW LADENHEIM and the firm of TREGO, HINES AND LADENHEIM, PLLC (the “Firm”) as special counsel, and in support of the Application shows the Court as follows:

1. The Debtor filed a Chapter 7 Petition in the United States Bankruptcy Court on June 8, 2023. John C. Bircher III was appointed Chapter 7 Trustee on June 12, 2023.
2. The Trustee would engage the Firm to advise the Trustee concerning legal issues surrounding intellectual property matters and to assist with any potential litigation pertaining to said intellectual property, should litigation be necessary. The Firm will take direction directly from the Trustee as it relates to its duties.
3. That Firm will be compensated on an hourly basis by filing fee applications with the Court pursuant to the Bankruptcy Administrator’s guidelines and after approval by the Court.
4. Matthew Ladenheim, as evidenced by and through the attached Affidavit, is qualified to serve as special counsel within the meaning of 11 U.S.C. § 327(a).
5. Pursuant to 11 U.S.C. § 327(a), the Trustee believes that the employment of the Firm as special counsel is in the best interest of the estate.

6. The Bankruptcy Court has jurisdiction over this matter pursuant to 28 USC §§ 1334, 151, 157, and this matter is a core proceeding pursuant to 28 USC § 157.

WHEREFORE, the Trustee prays unto the Court as follows:

1. That the Court enter an Order authorizing the Trustee to employ the Firm as special counsel to render the necessary legal services described herein;

2. That the Firm be compensated on an hourly basis by filing fee applications with the Court pursuant to the Bankruptcy Administrator's guidelines and after approval by the Court, and,

3. That it have and recover other relief the Court may deem just and proper.

Dated: 08/31/2023

s/John C. Bircher III  
John C. Bircher III  
N.C. State Bar No. 24119  
DAVIS HARTMAN WRIGHT LLP  
209 Pollock Street  
New Bern, NC 28560  
Telephone: (252) 514-2828  
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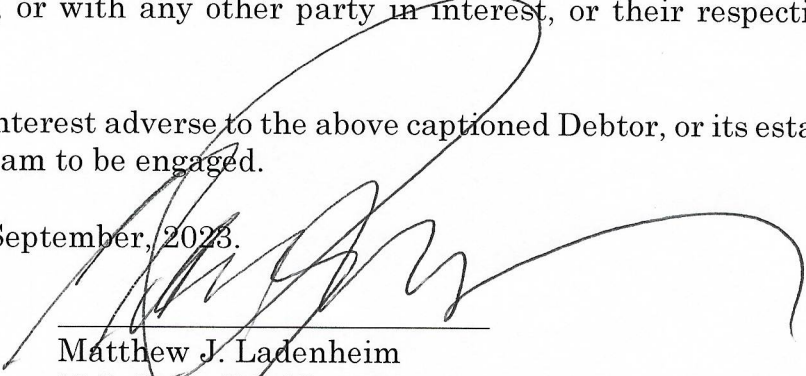
CHAPTER 7

**AFFIDAVIT OF MATTHEW J. LADENHEIM**

I, Matthew Ladenheim, Attorney, hereby make solemn oath that:

1. I am an Attorney and Counselor at Law, duly admitted to practice in the State of North Carolina.
2. Neither I, nor any member of my firm, have any connection with the above named Debtor, its creditors, or with any other party in interest, or their respective Attorneys.
3. I represent no interest adverse to the above captioned Debtor, or its estate in the matters upon which I am to be engaged.

This the 6 day of September, 2023.

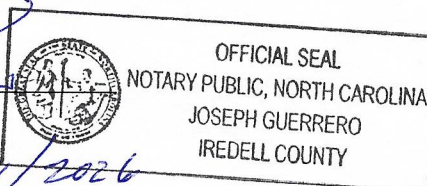
  
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Matthew J. Ladenheim  
N.C. State Bar No.29309  
FL Bar State Bar No.1015895  
10224 Hickorywood Hill Ave, Suite 202  
Huntersville, NC 28078  
(704) 599-8911  
[mjl@thlip.com](mailto:mjl@thlip.com)

Sworn to and subscribed this the

6th day of September, 2023.

Notary Public

My Commission Expires: 10/01/2026



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury that he is over eighteen (18) years of age and the APPLICATION OF EMPLOYMENT OF MATTHEW J. LADENHEIM AND TREGO, HINES & LADENHEIM, PLLC AS SPECIAL COUNSEL was this day served upon the below named parties by first class mail bearing sufficient postage or electronically as indicated:

Brian C. Behr  
Bankruptcy Administrator  
(via CM/ECF)

Algernon L. Butler, III  
Attorney for the Debtor  
(via CM/ECF)

TSR, LLC  
Attn: Justin W. LaNasa, Manager  
208 South Front Street, Unit 3  
Wilmington, NC 28401

Dated: 09/07/2023

s/John C. Bircher III  
John C. Bircher III  
N.C. State Bar No. 24119  
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